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February 8, 2022

VIA ECF

Hon. Colleen McMahon
United States District Judge
Daniel Patrick Moynihan
United States District Courthouse
500 Pearl Street
New York, New York 10007

Ok, extension granted.

MEMO ENDORSED

Colleen McMahon

2/10/2022

Re: *Telebrands Corp v. www.christmas-decors.com, et al.*,
Case No. 21-cv-7799
Request for an Extension of Time to File Motion for Default Judgement

Dear Judge McMahon,

We represent Plaintiff Telebrands Corp. ("Plaintiff") in the above-referenced matter.¹ For the reasons set forth herein, Plaintiff respectfully requests a second short extension of time to file its Motion for Default Judgement. By letter dated December 7, 2021, Plaintiff requested a first extension of time to file its Motion for Default Judgment, until February 10, 2022, which the Court granted by Order dated December 7, 2021. (Dkt. 34).

Since December 7, 2021, Plaintiff has resolved its claims against Defendants www.christmas-decors.com and www.tidetab.com, thus Plaintiff intends to file a Motion for Default Judgment against Defendant www.humaiyo.com only. Earlier today, Plaintiff's counsel noticed an error in the Clerk's Certificate of Default entered on November 10, 2021 (Dkt. 29). In accordance with the Clerk's office's instructions, Plaintiff filed a new Proposed Clerk's Certificate of Default, and a new, corrected Certificate of Default has since issued (Dkts. 37-39). In order to permit Plaintiff additional time to prepare and finalize its motion papers, and because Your Honor's Individual Rules require that Plaintiff provide Defendant with a minimum of twenty (20) days' notice prior to filing the requisite papers with the Court, Plaintiff respectfully requests a thirty (30) day extension of time to file its Motion for Default Judgment, until March 11, 2022, to give Defendant www.humaiyo.com time to appear should it wish to do so. This is Plaintiff's second request for an extension of time to file its Motion for Default Judgment.

We thank the Court for its time and attention to this matter.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary.

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Respectfully submitted,

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